

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

MICHAEL D. ROSE, *et al.*,

Plaintiffs,

V.

JEFF S. SANDY, *et al.*

Defendants.

Civil Action No. 5:22-cv-00405
(Judge Volk)

AMENDED NOTICE OF VIDEOTAPED DEPOSITION DUCES TECUM OF
ALFRED JOSHUA MD, MBA, CCHP-P, FAAEM

PLEASE TAKE NOTICE that Plaintiffs, by counsel, will take the videotaped deposition of Alfred Joshua MD, MBA, CCHP-P, FAAEM before a court reporter authorized to administer oaths. The deposition will take place on **Thursday, November 2, 2023, beginning at 9:00 a.m EST/ 6:00 a.m. PST via video conference**. A Zoom link will also be provided in advance of the deposition for all counsel that wish to attend via video conference. The deposition shall continue from day to day until completion and will be recorded by video, audio, audiovisual or stenographic means by a court reporter authorization to conduct such examinations.

You may appear to protect your interests.

PLAINTIFFS,

By Counsel,

/s/ Stephen P. New

Stephen P. New, Esq. (WVSB #7756)

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PRODUCTION REQUEST

- A complete copy of his file pertaining to this civil action;
- All documents and authorities reviewed and/or relied upon by him in formulating his opinions in the matter;
- All work notes regarding this action;
- His invoice(s) or billing file regarding work performed in this action; and,
- A list of all cases in which he has been retained by any of the Defendants' attorneys during the last five (5) years.

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CERTIFICATE OF SERVICE

I, Stephen P. New, counsel for Plaintiff, do hereby certify that on October 31, 2023, the *Amended Notice of Videotaped Deposition Duces Tecum of Alfred Joshua Md, MBA, Cchp-P, Faaem* was filed electronically through the Southern District of West Virginia's EM/ECF system, which will provide electronic notification to all counsel of record.

/s/ Stephen P. New

Stephen P. New (#7756)